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PACIFIC  **TELESIS**
Group - Washington

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December 20, 1993

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

**William F. Caton
Acting Secretary
Federal Communications Commission
Mail Stop 1170
1919 M Street, N.W., Room 222
Washington, D.C. 20554**

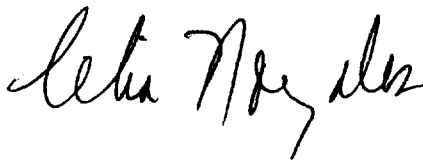
Dear Mr. Caton:

Re: CC Docket No. 92-91 - *Open Network Architecture Tariffs of Bell Operating Companies*

On behalf of Pacific Bell, please find enclosed an original and six copies of its "Motion To Extend Time To File Tariff Revisions" in the above proceeding.

Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

Sincerely,



Enclosures

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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DEC 20 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

Open Network Architecture Tariffs)
of Bell Operating Companies)
_____)

CC Docket No. 92-91

MOTION TO EXTEND TIME TO FILE TARIFF REVISIONS

Pacific Bell files this motion for extension of time in which to file tariff revisions in the above-captioned proceeding. The Commission's Order released on December 15, 1993 requires us to file tariff revisions by December 27, 1993.¹ Pacific Bell respectfully requests an extension of time for filing the revisions until January 14, 1994. In support of this request, we attach an affidavit of Jerry Abercrombie, Director, Competitive Safeguards/Ancillary Product Analytics, explaining the need for additional time to make the revisions required by the Commission's order.

For the reasons contained in the affidavit, Pacific Bell respectfully requests that the Commission grant this motion, extending time for filing the tariff revisions until January 14, 1994.

¹ In the Matter of Open Network Architecture Tariffs of Bell Operating Companies, CC Docket. No. 92-91, Order, released December 15, 1993, para. 87.

Respectfully submitted,

PACIFIC BELL



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Its Attorneys

Date: December 20, 1993

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Open Network Architecture Tariffs) CC Docket No. 92-91
of Bell Operating Companies)
_____)

AFFIDAVIT OF JERRY ABERCROMBIE IN SUPPORT OF PACIFIC BELL'S
MOTION TO EXTEND TIME TO FILE TARIFFS

I, Jerry Abercrombie, attest:

I am the Director, Competitive Safeguards/Ancillary Product Analytics. My staff is responsible for preparing the rates for the Open Network Architecture services that are included in our federal tariffs. Pursuant to the Commission's Order released on December 15, 1993, my staff is in the process of preparing the necessary tariff revisions. Although on the surface, the order does not appear to require extensive revision in the tariffs, significant time is still required to make the changes required by the order. If we were to meet the December 27th deadline, we would not be able to do any cross-checking that is critical in establishing accuracy. Providing some additional time now should eliminate any need for revisions that would likely be required if the results cannot be verified internally prior to filing.

The rate calculations require the work of two members of my staff that have the background and familiarity with these rates to make changes. While they need to work together, one handles the first phase of the calculations and the other handles the second phase of the calculations. This work must be done sequentially. It cannot be done concurrently.

The first phase of revising the rates involves the reloading of the version of SCIS used in the calculations. All traffic inputs and several other factors, such as the cost of money, switching types, and the price levels for the appropriate year must be examined for consistency. It may be necessary to contact Bellcore and/or Arthur Anderson if questions arise.

Calculations for the eight services will need to be rerun through the SCIS model individually. Then comparative analysis/sensitivity testing will be needed comparing the new results with the prior results.


I estimate that this phase involving the SCIS calculations will take my staff approximately two weeks.

The second phase begins when another member of my staff takes the SCIS outputs and enters this information into both the Tariff Review Plan and the BSA residual pricing spreadsheet. While this is relatively straightforward, it is still very time-consuming. Each product must be analyzed to verify that the results are correct and consistent with earlier filings. For the eight services my staff estimates that it will take four hours per service assuming that there are no significant changes in the BSE prices. However, if there are any significant changes, additional time must be allowed in order to calculate

the resulting BSA rates to maintain the required revenue neutrality.

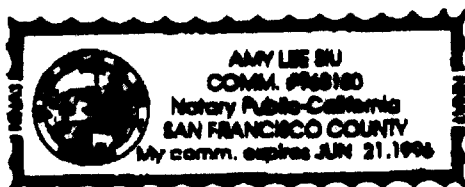
In addition, at this point both staff members need to consult on the results and to resolve any problems or issues that may have arisen during the process. Finally, the results must be described in writing. I estimate that this phase will also take approximately two weeks.

For all of the above reasons, Pacific Bell needs until January 14, 1994 to ensure that the necessary revisions are done carefully and are verified internally.


Jerry Abercrombie

State of California)
) ss.
County of San Francisco)

Sworn to and subscribed before me, a Notary Public, this
20th Day of December, 1993.




Notary Public